

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>Chapter 11</b>
<b>UGHS SENIOR LIVING, INC., et al.,</b>	<b>§</b>	
	<b>§</b>	<b>Case No. 15-80399</b>
<b>Debtors.<sup>1</sup></b>	<b>§</b>	
	<b>§</b>	<b>Joint Administration Requested</b>
	<b>§</b>	

**REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN “FIRST DAY” MATTERS**

On November 10, 2015, UGHS Senior Living, Inc., TrinityCare Senior Living, LLC, UGHS Senior Living Real Estate of Port Lavaca, LLC, UGHS Senior Living Real Estate of Pearland, LLC, UGHS Senior Living Real Estate of Knoxville, LLC, UGHS Senior Living of Pearland, LLC, UGHS Senior Living of Port Lavaca, LLC, UGHS Senior Living of Knoxville, LLC, TrinityCare Senior Living of Covington, LLC, UGHS Senior Living Real Estate, LLC, and TrinityCare Lighthouse of Pearland, LLC (collectively, the “Debtors”) each filed petitions for relief under Chapter 11 of the Bankruptcy Code. Counsel for the debtors believes that these cases qualify as “Complex Chapter 11 Cases.” The Debtors need emergency consideration of the following initial case matters (check those that apply\*):

**Debtors’ Emergency Motion for Order (a) Directing Joint Administration of Chapter 11 Cases Pursuant to Fed. R. Bankr. P. 1015(b) and S.D. Texas Bankr. L.R. 1015-1 and (b) Waiving Requirements of 11 U.S.C. §342(c)(1) and Fed. R. Bankr. P. 1005 and 2002(n) [Docket No. 3]**

**Debtors’ Emergency Motion for Interim and Final Orders (i) Authorizing (a) the**

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: UGHS Senior Living, Inc. (9334); TrinityCare Senior Living, LLC (1655), UGHS Senior Living Real Estate of Port Lavaca, LLC (0012), UGHS Senior Living Real Estate of Pearland, LLC (0653), UGHS Senior Living Real Estate of Knoxville, LLC (2405), UGHS Senior Living of Pearland, LLC (0704), UGHS Senior Living of Port Lavaca, LLC (0762), UGHS Senior Living of Knoxville, LLC (0826), TrinityCare Senior Living of Covington, LLC (4360), UGHS Senior Living Real Estate, LLC (5553), and TrinityCare Lighthouse of Pearland, LLC (2681).

Continued Use of Existing Cash Management System, Bank Accounts, Business Forms, and Deposit and Investment Practices; (b) Payment of Related Prepetition Obligations; and (c) a Waiver of Certain Operating Guidelines Relating to Bank Accounts; and (ii) Authorizing Continued Engagement in Intercompany Transactions Pursuant to 11 U.S.C. §§ 105(a), 345 and 363 and Fed. R. Bankr. P. 6003 and 6004 [Docket No. 13]

X Emergency Motion for Interim and Final Orders (i) Authorizing Secured Post-Petition Financing on a Super Priority Basis Pursuant to 11 U.S.C. §§ 363, 364, and 507(b); (ii) Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. §362; (iii) Granting Related Relief; and (iv) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 [Docket No. 10]

X Motion to Assume Leased Personnel Agreements with Employee Resources Administration, L.P. [Docket No. 9]

X Debtors' Emergency Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 363, 507(a), 541, 1107(a) and 1108, and Fed. R. Bankr. P. 6003 and 6004, to, *inter alia*, (i) authorize, but not direct, the debtors to pay prepetition wages, compensation and employee benefits; (ii) authorize, but not direct, the debtors to continue certain employee benefit programs in the ordinary course; and (iii) direct all banks to honor prepetition checks for payment of prepetition employee obligations [Docket No. 12]

X Debtors' Expedited Motion for Entry of Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 5]

Dated: November 11, 2015

/s/ Aaron J. Power  
John F. Higgins  
State Bar No. 09597500  
Aaron J. Power  
State Bar. No. 24058058  
Amy L. Tellegen  
State Bar No. 24083954  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
(713) 226-6000  
(713) 228-1331 (fax)

***Proposed Counsel for the Debtors and Debtors in Possession***